UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA

Plaintiff,

v. : No.: 1:21-cv-05578

JUAN REYES and : Dist. Judge Margo K. Brodie CATHERINE REYES, :

: Mag. Judge Roanne L. Man

Defendants.

Defendants' Response to Plaintiff United States of America's First Set of Interrogatories

Defendants Juan Reyes and Catherine Reyes, in response to plaintiff United States of America's first set of interrogatories, by and through the undersigned counsel, state as follows:

- 1. Sidney Yoskowitz, CPA (retired).
- 2. Defendants Juan Reyes and Catherine Reyes.

The parents of defendant Juan Reyes, viz., his father (also named Juan Reyes), and his mother Teresa Reyes. Both of defendant Juan Reyes's parents are deceased.

Defendants' son Juan Reyes III, Esq.

Sidney Yoskowitz, CPA (retired).

- Defendants have no recollection of withdrawals or deposits, independent of the documentation disclosed simultaneously herewith.
- 4. JP Morgan Chase. See documentation disclosed herewith, and account information previously disclosed voluntarily by defendants.
- 5. The defendants believed that the money was defendant Juan Reyes's parents' money, that had been placed in the names of the defendants.

 Exhibit

6. Defendant Juan Reyes's parents.

7. The defendants visited London in or about the year 2000 in order to visit family.

8. The defendants never visited Switzerland.

9. The defendants have no recollection of ever having spoken with any such persons;

rather, to the best of the defendants' recollection, such communications were

through ordinary letter correspondence.

10. The only account that is responsive to this interrogatory is the account at issue in

this lawsuit, and the information requested is set forth in the accompanying

document production.

11. This information was voluntarily disclosed to the IRS by defendants' counsel Doug

Allen of the Seyfarth law firm. The defendants do not possess details of such

voluntary disclosure.

12. Defendants are not in possession of credit cards, and the only information available

to the defendants that is response to this interrogatory is set forth in the

accompanying document production.

13. Defendants themselves.

Doug Allen of the Seyfarth Shaw law firm. See

https://www.seyfarth.com/search.html?q=allen

Juan Reyes, III of the Faeger Drinker law firm. See

https://www.faegredrinker.com/en/professionals?lastname=reyes

Sidney Yoskowitz, CPA, retired and current address unknown.

Dated: New York, New York

June 29, 2022

MAZZOLA LINDSTROM, LLP

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Is Richard E. Lerner
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Counsel for defendants

To: (Via Email)

AUSA Philip L. Bednar AUSA Julia M. Glen

CERTIFICATE OF SERVICE

I certify that on June 29, 2022, I caused a copy of the foregoing document to be delivered by electronic mail (where indicated below) to counsel for plaintiff United States:

Philip.L.Bednar@usdoj.gov Julia.M.Glen@usdoj.gov

Dated: New York, New York June 29, 2022

MAZZOLA LINDSTROM, LLP

Is | Richard E. Lerner Richard E. Lerner, Esq. 1350 Avenue of the Americas, 2nd Floor New York, NY 10019 Richard@mazzolalindstrom.com Counsel for defendants